

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

REMOVE YOUR CONTENT, LLC

Plaintiff,

v.

MARK BOCHRA,

Defendant

§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. 3:09-cv-393

**Motion For Legal Assistance**

Defendant, Mark Bochra respectfully submit the following motion and requests from the Honorable Court for possible Legal Assistance for the following reasons:

1. Defendant Mark Bochra is a college student who has attended 3 different Universities in the past 4 years (University of Illinois at Chicago, North Eastern University, and Wright college). The Defendant will graduate from the university of Illinois at Chicago in spring of 2010. Mark through his educational journey in his high school and college have proven to be an exemplary student who received multiple awards and accolades regarding his involvement in the community and his performance in school and college. His success in college and the passion to help the community continues to this day.
2. Due to Defendant limited finances, defendant is unable to compact with a long term lawsuit by himself.
3. Defendants was trying his best to compact with such ambiguous lawsuit sought by the Plaintiff and Plaintiff's attorneys and in the same time, tries to focus on his last courses toward graduation. However, the extreme burden of the legal matter has caused the defendant to fail one of his courses - Organic Chemistry II and took an incomplete in the course and will not be able to graduate unless he finishes the required course next semester. Furthermore, Defendant was receiving mostly A's and B's in spring of 2009 courses and is always a full time student, however, his grades started to drop when the defendant started to compact with the following lawsuit during fall of 2009. Defendant's grades changed from A's and B's to C's which will affect his overall GPA.
4. Defendants is a College student who wishes to attend medical school in order to become a cardiac doctor. Moreover, Defendant was supposedly be focusing on studying for his graduate medical exam and be able to receive his Bachelor of Science Degree in Biology in fall of 2009 and attend the graduate ceremony with his family in spring of 2010 and concentrate on applying to medical school and its hectic procedure. However, the following lawsuit has deprived the Defendant's right from doing some or all of the followings and has caused extreme suffering, anxiety, and other serious health issues to the Defendant (A copy of the defendant's medical

situation was mailed in a sealed envelope on November 13, 2009 from uic consoling center, in addition, to a different sealed medical record that was mailed on September 24, 2009).

5. After Initial disclosure with the Plaintiff's attorney, Defendant now acquired evidence that proves that the Defendant Mark Bochra is not the one involve in creating the alleged blogs or emails. However, without legal assistance or the court's assistance, defendant Mark Bochra does not know how to proceed with such evidence in front of the court by himself. Moreover, Defendant is a resident of Chicago and not of Texas, which puts excessive burden on Mark's condition due to limited finances, time, and the expensive costs of travel.

6. Furthermore, Defendant requests the court's assistance in order to file a subpoena identifying the user name "removeyourcontent" who has verbally harassed the Defendant and was intentionally defaming and inflicting emotional distress on the Defendant prior to the original complain filled on August 14, 2009. Specifically, after the response to the UIC-Subpoena was received and stamped by Plaintiff's attorney on June 9, 2009. On this same day, Plaintiff used such information and posted information related to the Defendant online, on an adult website; ignoring the court's rules or procedure. Plaintiff has wrongfully misused the subpoena's information in such a wrongfully manners.

7. Does the court require more evidence identifying the username "removeyourcontent" or is the matching date June 9, 2009 is enough evidence in proving that it is indeed the plaintiff who verbally harassed the Defendant on an adult website (please see attached documents).


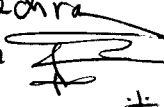
8. In addition, the same user name "removeyourcontent" has posted other individuals' names, home addresses, telephone numbers, and other private information on purpose on the web in the past year. This is a clear violation of PII "Personal identifying information" law, which prevents people from releasing an individual's private information. PII can be exploited by criminals to stalk or steal the identity of a person, or to plan a person's murder or robbery, among other crimes.

9. Although, Defendant's limited finances allows him to seek free legal aid in Chicago, however none of the free legal aid could consider providing legal advice or representing Mark in the following legal matter, due to the nature of the case (Litigation and Business Litigation) or due to the reason that the case is filed in Texas and no free attorney in Chicago could represent the defendant in a lawsuit in a state other than Chicago.

WHEREFORE, PREMISES CONSIDERD, for these reasons, Defendant prays that this motion be considered

Respectfully Submitted,

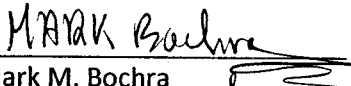
MARK Bochra  
Mark M Bochra  
Defendant



**Civil Action No. 3:09-cv-00393-O**

**CERTIFICAT OF SERVICE**

I, Mark M. Bochra, do hereby certify that on the 12<sup>th</sup> day of December, 2009, the foregoing document was mailed to the clerk of court for the U.S. District Court, Northern District of Texas, 110 Commerce Street, Room 1452, Dallas, TX 75242.

  
Mark M. Bochra  
5757 N. Sheridan Rd  
Apt. # 13B  
Chicago, IL 60660

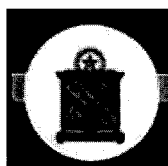
12/12/09  
Date

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& COURSE  
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FACULTY](#)[ALUMNI &  
DONORS](#)[DONATE](#)[FORMS](#)

**Brilliant Futures:  
The Campaign for  
the University of  
Illinois at Chicago**

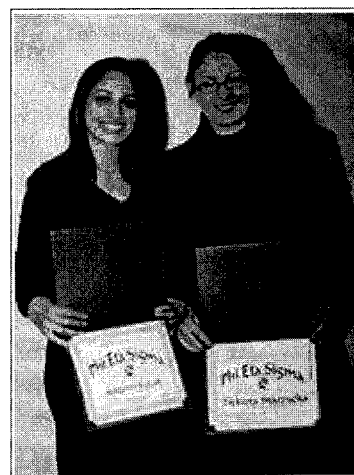
**Phi Eta Sigma**

## Phi Eta Sigma

The **2006** Phi Eta Sigma Induction Ceremony took place on Tuesday, March 28th in the Illinois Room of the Student Center East. 139 new members were inducted this year.

Chemistry Professor **Sharon Fetzer-Gislason** gave the keynote address. Professor Fetzer-Gislason encouraged the new inductees to continue to strive for excellence, and to take advantage of all of the technological resources that UIC has to offer them.

Scholarships were presented to **Mosmi Surati** and **Elzbieta Starzycka**. Later, new Phi Eta Sigma members and their guests enjoyed a reception in the adjoining room. Additionally, music by the Honors College String Ensemble was enjoyed by all.

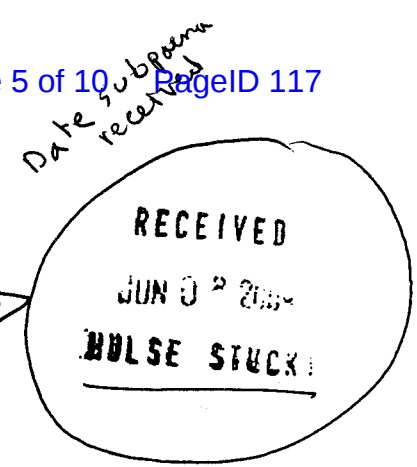


Congratulations to all 2006 new Phi Eta Sigma inductees. Keep up the good work!

Daniel L. Allen  
 Arash Amini  
 Nicole B. Asavalertpanich  
 Aisha T. Awan  
 Timothy E. Ayalin  
 Nicholas M. Bacos  
 Daniel I. Ban  
 Robert J. Bennett  
 Mark Berardi  
**Mark M. Bochra** ←  
 Tania Boisson  
 Elizabeth A. Boyle  
 Riley E. Brannen  
 Kristy M. Breitbach  
 Meica T. Brown  
 Daniela Michelle Bustamante  
 Evan F. Caccioppoli  
 Omar A. Carbajal  
 Matthew C. Chan  
 Natalie Khouv Chhim  
 Yi Seul (Grace) Choi  
 Jesse S. Christ  
 Ashley D. Christensen  
 Caitlin Starr Cohn  
 Stephanie N. Crowley  
 Andrew Devine  
 Mark Samuel DiKopf

UNIVERSITY OF ILLINOIS  
Chicago • Springfield • Urbana-Champaign

Office of University Counsel (MC 225)  
405 Administrative Office Building  
1737 West Polk Street  
Chicago, Illinois 60612-7228



June 5, 2009

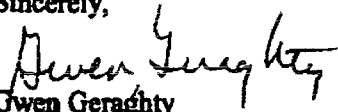
**Via First Class Mail**  
Ellen Sacco, Esq.  
Hulse Stucki PLLC  
2912 West Story Road  
Irving, Texas 75038

**Re: Remove Your Content, LLC v. John Does 1-20**  
**Subpoena Issued by the US District Court for the Northern District of Illinois**

Dear Ms. Sacco,

Attached please find copies of documents responsive to the subpoena you issued to The Board of Trustees of the University of Illinois in the above-referenced matter. One of the documents has been redacted, in part, to remove information which is beyond the scope of the request, pertains to other users and may be privileged from production pursuant to the Family Educational Rights and Privacy Act (FERPA) or other privacy laws.

Sincerely,

  
Gwen Geraghty  
Associate University Counsel

CC: Donna Williamson

RYC 000023

Exhibit 1

visit to you dude. Unfortunately you were not available, **we** had some **chicks** that would **love** to **sperm** her \*\*\* on you man. R these info correct man? {info removed} Stay tune buddy, keep angering as many adult webmasters as possible. If you're specialized in stalking adult sites, we are specialist in the DOPE and shit like you. Carma is a bitch man, remember. We love nuking people like you. Stay tune, DopeNull

This looks like a batman riddle, but ive solved it for ya

removeyourcontent

June 9th, 2009 09:56 AM

Took awhile but we can now officially clear chroniccentral.net's name, on this post, as it was not them. **Mr. Bochra** our attorneys will be in touch.

Head Boy

June 9th, 2009 10:22 AM

Can we get back to the food Toker was offering to us? :)

silicuda

June 9th, 2009 10:40 AM

Quote:

Originally Posted by **Dopenull** (Post 342248)  
**Carma** is a bitch man!

I thought it's spelled Karma ...

biztem

June 9th, 2009 11:06 AM

check mate

removeyourcontent

June 9th, 2009 01:52 PM

Quote:

Originally Posted by **Head Boy** (Post 364607)  
Can we get back to the food Toker was offering to us? :)

AskDx threads do sensationally well in google. Lol. Free food is always a plus as well :brow:



Exhibit 2

**AskDamageX.com Webmaster Forum** (<http://www.askdamagex.com/>)- **The Public Shitlist & Cheaters** (<http://www.askdamagex.com/f14/>)- **tru-dymez.com / fucktubetv.com** (<http://www.askdamagex.com/f14/tru-dymez-com-fucktubetv-com-32424/>)

removeyourcontent

November 27th, 2008 12:52 AM

**tru-dymez.com / fucktubetv.com**

Operates thieving tube site fucktubetv.com. Over 100 videos sent for removal today.

Jones, Quincy  
RR 3 Box 3639  
Townsend, Georgia 31331  
United States  
9128326775

PII Information

removeyourcontent

November 27th, 2008 10:20 PM

I love it when pirates threaten to sue. It's equatable to drug dealers threatening to sue the police for disrupting their operations. 200 calls my ass.

Also.. Quincy... your information is public.

<http://whois.domaintools.com/fucktubetv.com>

Now.. with this little stunt, we're now forwarding every infringing video we find, in the future, directly to our client's attorneys.. over 60 at last count.

Have a nice day.:finger:

"Hi

I am Quincy Jones.

Owner of Fuctubetv.com.

I have complied with all your requests to remove all the copyright materials.

I am currently going to all the videos to delete copyright contents.

I do have an issue.

That issue is I received over 200 calls today.

Regarding a post that was found on a forum "Askdamagex.com"

The post was from your Handle Name in affiliate with your site.

Implying my address, phone number, and name.

<http://www.askdamagex.com/f14/tru-dymez-com-fucktubetv-com-32424/>

Being that after your request of removal of contents.

I find it very unprofessional to do such vindictive action on your part..

After the fact you contacted me very professionally.

To come down to releasing my personal info in this manner. In a public forum.

You and I know the law protects both ways.

The copyright way and human way.

I have contacted my lawyer .

He had informed me I fall under the DMCA Title II, the Online Copyright Infringement Liability Limitation Act Safe Harbour protection.

Also I have contacted local law enforcement to document the thread on the forum of unlawfully releasing my personal information.

The reason I had to go this route is to protect any jeopardization of my immediate family and damages that may or may not come upon in the future.

With respect to you and your business [www.removeyourcontent.com](http://www.removeyourcontent.com)

I have the faith you will deal with this matter promptly



Exhibit 2

Quote:

Originally Posted by **JD** (Post 317979)  
haha what a god damn retard.

**WHOIS INFORMATION IS PUBLIC INFORMATION**

Whois Information might be public information at the Whois Site, posting it on a public forum might be a bit different in my opinion ....

I mean peoples names, addresses and phonenumbers are public information in phonebooks as well, but i doubt i can post them on porn forums or other places just like i wish. :2c:

removeyourcontent → removeyourcontent.com

November 28th, 2008 12:13 PM

Quote:

Originally Posted by **Pornonada** (Post 318075)  
*Whois Information might be public information at the Whois Site, posting it on a public forum might be a bit different in my opinion ....*

*I mean peoples names, addresses and phonenumbers are public information in phonebooks as well, but i doubt i can post them on porn forums or other places just like i wish. :2c:*

Criminals have no privacy privileges :2c:

Horny Joe

November 28th, 2008 02:14 PM

Don't know what the law say, but I do know that it works two ways. That being said, I doubt that you will get in any heat for that!

JACOBKELL

November 28th, 2008 03:04 PM

Quote:

Originally Posted by **Pornonada** (Post 318075)  
*Whois Information might be public information at the Whois Site, posting it on a public forum might be a bit different in my opinion ....*

*I mean peoples names, addresses and phonenumbers are public information in phonebooks as well, but i doubt i can post them on porn forums or other places just like i wish. :2c:*

You can make both your tel number and domain private(unless someone have whois history viewer)

Pornonada

December 6th, 2008 11:34 AM

Quote:

Originally Posted by **JACOBKELL** (Post 318127)  
*You can make both your tel number and domain private(unless someone have whois history viewer)*



Exhibit 2

While i'am very advanced in many levels of the law i'am indeed not an expert when it comes to privacy laws so i follow just common logic and in that case i would say that i could indeed be against a law.

Look, it's one thing what i could do for whois privacy or personal info privacy, BUT even IF i do NOT use any additionally features doesn't mean automatically everybody could/should use personal information anyway he might think it's ok.

## Pornonada

December 6th, 2008 11:37 AM

Quote:

Originally Posted by **removeyourcontent** (Post 318096)  
*Criminals have no privacy privileges :2c:*

My comment was more principal and generally, so is this one. Let me say it that way, just because someone did a crime doesn't mean automatically you can do him something illegal as well. As i said, just generally and about privacy as i think that things are not as easy as some may think they are....

## removeyourcontent

December 6th, 2008 01:47 PM

Quote:

Originally Posted by **Pornonada** (Post 320351)  
*My comment was more principal and generally, so is this one. Let me say it that way, just because someone did a crime doesn't mean automatically you can do him something illegal as well. As i said, just generally and about privacy as i think that things are not as easy as some may think they are....*

Bullshit.

## JD

December 6th, 2008 03:49 PM

Quote:

Originally Posted by **Pornonada** (Post 318075)  
*Whois Information might be public information at the Whois Site, posting it on a public forum might be a bit different in my opinion ....*

*I mean peoples names, adresses and phonenumber are public information in phonebooks as well, but i doubt i can post them on porn forums or other places just like i wish. :2c:*

It is public information that is freely available for anyone to look up. Your opinion is wrong.

As for phone books, it's freely available information that can be looked up by anyone with working eyes. Same concept as whois.

## Pornonada

December 7th, 2008 01:23 AM

Quote:

Originally Posted by **JD** (Post 320416)  
*It is public information that is freely available for anyone to look up. Your opinion is wrong.*



Exhibit 3

**AskDamageX.com Webmaster Forum** (<http://www.askdamagex.com/>)

- **The Public Shitlist & Cheaters** (<http://www.askdamagex.com/f14/>)
- **Poshalim.tv** (<http://www.askdamagex.com/f14/poshalim-tv-29419/>)

removeyourcontent

August 14th, 2008 08:03 PM

**Poshalim.tv**

Stolen content galore but there's a catch... He's reselling it for profit.

**<http://poshalim.tv>**

Operating the following CJ sites:

<http://dayana.in/> - Main Trade Site

<http://bigporevo.com/>

<http://trampampam.com/>

<http://gdelegytporno.com>

<http://gdetutporno.com>

<http://tutestsex.com>

<http://dailyhomevids.com>

<http://sexyfatbooty.com>

<http://skladporno.com>

<http://fotosexa.com>

<http://poshalim.com>

<http://whois.domaintools.com/213.174.136.223>

Administrative Contact:

Multimedia & Internet Exploitatie BV

Helg Gregorson (thexelg@gmail.com)

Walsoordensestraat 72

WALSOORDEN

null,4588KD

NL

Tel. +31.102821503

PII Information

All times are GMT -7. The time now is 10:10 AM.

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